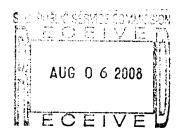
## SALUDA NURSING CENTER

581 Newberry Highway Post Office Box 398 Saluda, South Carolina 29138-0705

Robert F. Bowles, NHA Administrator

August 4, 2008



Phone 864-445-2146 Fax 864-445-3119

Mr. Charles L. A. Terreni Chief Clerk/Administrator South Carolina Public Service Commission 101 Executive Center Dr., Suite 100 Columbia SC 29210

Re: Rulemaking Regarding Certain Transportation Regulations, Including Drug Testing for Passenger Carriers – Notice of Drafting Filed with the South Carolina Legislative Council

Docket No. 2007-445-A

Dear Mr. Terreni:

This letter is to state my serious concerns with your impending decision on the above docket number 2007-445-A. The request for change to approve regulations allowing "Stretcher Vans" in South Carolina will be taking SC back into the days before 1974.

I offer adamant objection to the proposed regulatory change in transportation to allow non-EMTs to transport via a stretcher. As qualification to offer you informed data, I list the following credentials:

- NHA (licensed nursing home administrator) since 1970
- EMS Director since 1974
- involved with EMS since its very inception in SC
- Awarded the Warren D. McBride award for what I have done in EMS in this state in 2003
- Charter member of the Midlands EMS Management Association—the only charter member who remains on that Board.
- Past EMT Instructor.

Few if any people who need to be transported by a stretcher to medical appointments can be safely transported in any vehicle that is not licensed by DHEC. The current EMS regulations state that there is penalty of a fine for transporting people for medical care on a stretcher that is not a licensed ambulance.

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Letter to Public Service Commission

Re: Changing regulations in SC to allow "Stretcher Vans"

Who will inspect "Stretch vans"? The goal of this change in regulation is to save money, but it will result in more cost due to the injurious effects it will have on the frail, vulnerable elderly individuals that these vehicles will transport. People who cannot defend themselves, cannot verbalize problems that occur – and a first aid trained person will not recognize subtle significant changes. These attendants will not know when IV's are needed. What if suctioning is needed? Most of these individuals requiring transport will be our elderly population--Our greatest generation.

Please do not approve this change in regulation. Our state has made progress in EMS and does not need to take steps backwards. We do not need to go back to the days before July, 1974. The cost is in precious life is too high.

Sincerely,

Robert F. Bowles, NHA

Killer & Bouler

Administrator